

**OAKLAND COUNTY'S BRIEF IN OPPOSITION TO
MOTION OF THE OFFICIAL COMMITTEE OF RETIREES TO COMPEL
PRODUCTION OF A PRIVILEGE LOG**

Exhibit 3

Affidavit of Keith Lermينياux, Esq.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re

CITY OF DETROIT, MICHIGAN

Debtor.

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

**Affidavit Of Keith Lerminiaux Esq. In Support Of Oakland County's
Brief In Opposition To Motion Of The Official Committee Of Retirees
To Compel Production Of A Privilege Log**

1. I am above the age of 18 and am competent to testify in a Court of law, and if called to do so, I would testify from my personal knowledge, under oath as set forth herein.

2. I am Corporation Counsel for the County of Oakland. I have held this position for 1 year. Prior to being Corporation Counsel, I was Deputy Corporation Counsel and held that position for 13 years.

3. On May 8, 2014, Oakland County produced 2,967 documents, consisting of 29,678 pages, in the City of Detroit Bankruptcy, in response to the document subpoena issued by the Official Committee of Retirees.

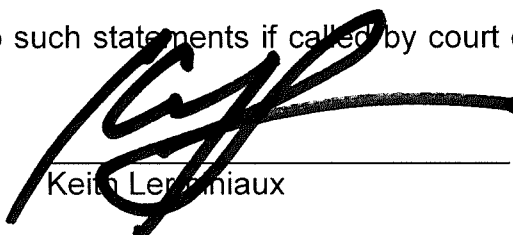
4. Oakland County withheld from production on May 8, 2014, approximately 3,557 documents on the grounds that they were privileged.

5. Of the approximately 3,557 documents withheld, approximately 1,458 were withheld as attorney-client privileged; approximately 382 were withheld as work-product privileged; approximately 1 was withheld as subject to the joint defense and/or

common interest privilege; and approximately 1,717 were withheld as subject to the governmental deliberative process privilege.

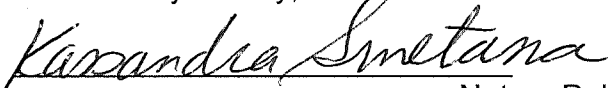
6. To prepare a privilege log from the above information would impose a very real burden on Oakland County, and there is no cache of money available to do so.

7. I make this Affidavit on my own knowledge and belief, and competent to testify to such statements, and will testify to such statements if called by court order to do so.



Keith Lenthiaux

Subscribed and sworn to before me
this 9th day of May, 2014



Kassandra Smetana

Kassandra Smetana
NOTARY PUBLIC - STATE OF MICHIGAN
COUNTY OF Oakland

My commission expires: 4/6/2018, Notary Public My Commission Expires April 6, 2018
Oakland County, Michigan Acting in the County of Oakland